

EXHIBIT 12

Honorable Jamal N. Whitehead

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

VALVE CORPORTION,)	Case No.: 2:23-cv-01016
)	
Plaintiff,)	DEFENDANTS' DISCLOSURE OF
v.)	PROPOSED ESI SEARCH TERMS
)	
LEIGH ROTHSCHILD, ROTHSCHILD)	
BROADCAST DISTRIBUTION)	
SYSTEMS, LLC, DISPLAY)	
TECHNOLOGIES, LLC, PATENT ASSET)	
MANAGEMENT, LLC, MEYLER LEGAL)	
PLLC, AND SAMUEL MEYLER)	
)	
Defendants.)	
)	

Pursuant to Section C(2)(a)(i) of the Agreement Regarding Discovery of Electronically Stored Information and Order (Dkt. No. 51), Defendants Leigh Rothschild, Rothschild Broadcast Distribution Systems, LLC, Display Technologies, LLC, Patent Asset Management, LLC, Meyler Legal PLLC, and Samuel Meyler identify the following search terms that they propose to use in searching the email of each of the custodians identified in Defendants' Initial ESI Disclosures, viz., Leigh Rothschild; Daniel Falcucci; Christina Arias; and Samuel Meyler.

- (1) 8,856,221 or '221
- (2) 9,402,664 or '664
- (3) 8,617,160 or '160
- (4) 8,671,195 or '195
- (5) Kizza Johnson
- (6) Jay
- (7) Display Technologies or DT

- 1 (8) Rothschild Broadcast Distribution Systems
2 (9) 9,300,723 or '723; and
3 (10) Global Settlement and License Agreement.

4 Respectfully submitted,

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22 *Management, LLC, Meyler Legal, PLLC, and*
23 *Samuel Meyler*